

STATEMENT OF BASIS (AI No. 146874)

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0122998 to discharge to waters of the State of Louisiana.

THE APPLICANT IS: Coastal Tank Cleaning, LLC
Coastal Tank Cleaning
1115 Front Street
Morgan City, Louisiana 70380

ISSUING OFFICE: Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313

PREPARED BY: Michelle Bickham

DATE PREPARED: June 13, 2007

1. PERMIT STATUS**A. Reason For Permit Action:**

First time issuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term.

B. NPDES permit -

NPDES permit effective date: N/A

NPDES permit expiration date: N/A

C. LWDPs permit -

LWDPs permit effective date: N/A

LWDPs permit expiration date: N/A

D. Date Application Received: January 17, 2007**2. FACILITY INFORMATION****A. FACILITY TYPE/ACTIVITY - barge cleaning facility**

Coastal Tank Cleaning, LLC is an existing barge cleaning facility. Various types of barges including open top barges, tank barges, shale barges, and deck barges are cleaned at the facility. The interiors as well as the decks of barges are cleaned removing grease, diesel, petroleum based muds, oil (sweet and sour), mud and rust. Bilge water is also pumped from barges and discharged. The facility discharges approximately 16,000 gallons per day and discharges about two to three times per month.

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B. FEE RATE

1. Fee Rating Facility Type: minor
2. Complexity Type: II*
3. Wastewater Type: II
4. SIC code: 4491**, 4499, 1389

*BPJ based on similar facilities. Additionally, in accordance with LAC 33.IX.1319, facilities classified as SIC codes 4463 and 1389 with internal cleaning of equipment are assigned a complexity designation of III. However, because the facility has such a low flow, the complexity type for the facility will be BPJ'ed to II with a corresponding 10 points.

**Appendix A - Section IV (Relation of 1987 to 1977 Industries) of the Standard Industrial Classification Manual, the SIC code 4491 is equivalent to a previous SIC code of 4463

C. LOCATION - Atchafalaya River Mile 97.6, Morgan City, St. Mary Parish
Latitude 29°42'08", Longitude 91°12'50"

3. OUTFALL INFORMATION

Outfall 001

Discharge Type: barge washwater and bilge water
Treatment: filter pod (removes solids from water)
Location: at the point of discharge from the filter pod treatment system (Latitude 29°42'08", Longitude 91°12'50")
Flow: 16,000 gpd (2-3 times per month)
Discharge Route: directly to the Atchafalaya River

4. RECEIVING WATERS

STREAM - Atchafalaya River

BASIN AND SEGMENT - Atchafalaya River Basin, Segment 010501

DESIGNATED USES - a. primary contact recreation
b. secondary contact recreation
c. propagation of fish and wildlife
d. drinking water supply

5. PROPOSED EFFLUENT LIMITS

BASIS - See Rationale below.

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6. COMPLIANCE HISTORY/COMMENTS

A. Compliance History

There have been no inspections at the facility.

B. DMR Review/Excursions

There are no DMR's for the facility as it is a new facility that has not had a permit.

7. EXISTING EFFLUENT LIMITS

N/A

8. ENDANGERED SPECIES

The receiving waterbody, Subsegment 010501 of the Atchafalaya River Basin, has been identified by the U.S. Fish and Wildlife Service (FWS) as habitat for the Gulf Sturgeon and Pallid Sturgeon, which are listed as a threatened and an endangered species. This draft permit has been submitted to the FWS for review in accordance with a letter dated 9/29/06 from Watson (FWS) to Brown (LDEQ). As set forth in the Memorandum of Understanding between the LDEQ and the FWS, and after consultation with FWS, LDEQ has determined that the issuance of the LPDES permit is not likely to have an adverse effect upon the Gulf Sturgeon and Pallid Sturgeon. Effluent limitations are established in the permit to ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. The more stringent of technology and water quality based limits (as applicable) have been applied to ensure maximum protection of the receiving water.

9. HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

10. TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a permit for the discharge described in the application.

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11. PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

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Rationale for Coastal Tank Cleaning, LLC

1. Outfall 001 - barge washwater and bilge water (estimated flow is 16,000 gpd)

<u>Pollutant</u>	<u>Limitation</u> Mo. Avg:Daily Max (mg/l)	<u>Reference</u>
Flow	Report:Report	LAC 33:IX.2701.I.1.b
BOD ₅	22:61	40 CFR 442, Subpart C
TSS	26:58	40 CFR 442, Subpart C
Oil & Grease	16:36	40 CFR 442, Subpart C
Cadmium	---:0.020	40 CFR 442, Subpart C
Chromium	---:0.42	40 CFR 442, Subpart C
Copper	---:0.10	40 CFR 442, Subpart C
Lead	---:0.14	40 CFR 442, Subpart C
Mercury	---:0.0013	40 CFR 442, Subpart C
Nickel	---:0.58	40 CFR 442, Subpart C
Zinc	---:8.3	40 CFR 442, Subpart C
pH	6.0 - 9.0s.u.	40 CFR 442, Subpart C

Treatment: filter pod treatment system

Monitoring Frequency: 1/month for flow, BOD₅, TSS, Oil & Grease and pH;
1/quarter for Cadmium, Chromium, Copper, Lead, Mercury, Nickel, and Zinc at
the point of discharge from the filter pod treatment system.

Limits Justification: Limits and Monitoring Frequency are based on 40 CFR 442, Subpart C, Tank Barges and Ocean/Sea Tankers Transporting Chemical and Petroleum Cargos and on current guidance for similar discharges from other facilities. NOTE: Residual hauled fluids known as "heels" are not authorized to be discharged through this outfall. The "heels" are subject to the no discharge requirement for drilling fluids as addressed in the effluent guidelines and standards for the Coastal Subcategory of the Oil and Gas Extraction Point Source Category (40 CFR 435).

This facility is subject to Effluent Limitations Guidelines for Transportation Equipment Cleaning, 40 CFR Part 442, because, in accordance with 40 CFR 442.1.a, "this part applies to discharges resulting from cleaning the interior of tanks used to transport chemical, petroleum or food grade cargoes." This facility cleans barges containing petroleum based muds, diesel, grease, and oils.

BPJ Best Professional Judgement
su Standard Units

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NOTE

For outfalls containing concentration limits, the usage of concentration limits is based on BPJ for similar outfalls since the flow is variable and estimated.

STORM WATER POLLUTION PREVENTION PLAN (SWP3) REQUIREMENT

A SWP3 is included in the permit because in accordance with LAC 33:IX.2511.A.1, stormwater shall not be required to obtain an LPDES permit "... except... discharges associated with industrial activity." In accordance with LAC 33:IX.2511.B.14.h, facilities classified as SIC code 4499 are not considered to have storm water discharges associated with industrial activity unless they have "vehicle maintenance shops, equipment cleaning operations, or airport deicing operations." This facility does have equipment cleaning operations. In accordance with LAC 33:IX.2511.B.14.h, facilities classified as SIC code 1389 are considered to have stormwater discharges associated with industrial activity. This facility is covered under both SIC codes; therefore, an SWP3 plan is required.

The SWP3 shall be prepared, implemented, and maintained within six (6) months of the effective date of the final permit. The plan should identify potential sources of storm water pollution and ensure the implementation of practices to prevent and reduce pollutants in storm water discharges associated with industrial activity at the facility (see Part II of the permit).

In addition, the facility is subject to Best Management Practices (BMPs) for cleaning dry cargo barges (see Part II of the permit).

TMDL WATERBODIES

Subsegment 010501 is listed on LDEQ's Final 2004 303(d) List as impaired for mercury. To date no TMDL's have been completed for this waterbody. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by a TMDL. Until completion of TMDL's for the Atchafalaya Basin, those suspected causes for impairment which are not directly attributed to the barge cleaning point source category have been eliminated in the formulation of effluent limitations and other requirements of this permit. Additionally, suspected causes of impairment which could be attributed to pollutants which were not determined to be discharged at a level which would cause or have the reasonable potential to cause or contribute to an excursion above any present state water quality standard were also eliminated.

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Therefore, for the purposes of this permit, the mercury impairment will be addressed in a manner consistent with the Department's permitting guidance for implementing Louisiana's surface water quality standards as follows:

Mercury

To protect against the further impairment of the mercury impairment cause, a mercury limit has been placed on the Outfall 001.